Page 1 of 3

EXECUTIVE SUMMARY - ENFORCEMENT MATTER DOCKET NO.: 2007-1089-PWS-E TCEQ ID:RN101404887 CASE NO.: 34136 RESPONDENT NAME: CITY OF EDGEWOOD

ORDER TYPE:		
_1660 AGREED ORDER	X_FINDINGS AGREED ORDER	FINDINGS ORDER FOLLOWING SOAH HEARING
FINDINGS DEFAULT ORDER	_SHUTDOWN ORDER	IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
AMENDED ORDER	EMERGENCY ORDER	
CASE TYPE:		
ATR	MULTI-MEDIA (check all that apply)	INDUSTRIAL AND HAZARDOUS WASTE
X PUBLIC WATER SUPPLY	PETROLEUM STORAGE TANKS	OCCUPATIONAL CERTIFICATION
WATER QUALITY	SEWAGE SLUDGE	UNDERGROUND INJECTION CONTROL
MUNICIPAL SOLID WASTE	RADIOACTIVE WASTE	DRY CLEANER REGISTRATION
County Road 3504 near Edgewood, Van Zan TYPE OF OPERATION: Public water sup SMALL BUSINESS: Yes X OTHER SIGNIFICANT MATTERS: Ther 2008, alleging that the water had a "fishy" sm	ply system No e are no complaints associated with this enforce hell and a bad taste. The TCEQ Tyler Regiona	from intersection of County Road 2507 and ment action. Three complaints were received in 1 Office investigated and issued an NOV to the ing enforcement actions regarding this facility
INTERESTED PARTIES: No one other tha	an the ED and the Respondent expressed an int	erest in this matter.
COMMENTS RECEIVED: The Texas Reg	ister comment period expired May 18, 2009.	No comments were received.
Ms. Lena Rober SEP Coordinator: Ms. Sharon Blue TCEQ Enforcement Coordinator: TCEQ Regional Contact: Mr. Noo Respondent: The Honorable Charl	Litigation Division, MC R-12, (713) 422-8916 ts, Litigation Division, MC 175, (512) 239-002 e, SEP Coordinator, MC 175, (512) 239-2223 Ms. Andrea Linson-Mgbeoduru, Water Enforcel Luper, Tyler Regional Office, MC R-5, (903 es Prator, Jr., Mayor of Edgewood, P.O. Box 3 sented by counsel on this enforcement matter.	rcement Section, MC 169, (512) 239-1482) 535-5174

RESPONDENT NAME: CITY OF EDGEWOOD DOCKET NO.: 2007-1089-PWS-E

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION

Types of Investigation:

__ Complaint

X Routine

Enforcement Follow-up

X Records Review

Date of Complaint Relating to this Case: None

Dates of Investigations Relating to this Case: March 11, 2007 and August 3, 2007

Dates of NOEs Relating to this Case: June 23, 2007 and September 7, 2007

Background Facts:

The EDPRP was filed February 29, 2008. The Respondent filed an Answer and the case was referred to SOAH. The preliminary hearing was waived. On February 27, 2009, the Executive Director received a signed Agreed Order from the Respondent.

Current Compliance Status:

Not yet in compliance

PWS:

- 1. Failed to submit Surface Water Monthly Operating Reports ("SWMORs") by the tenth day of the month following the end of the reporting period [30 Tex. ADMIN. CODE §§ 290.110(e)(2) and 209.111(e)(2)].
- 2. Failed to maintain the turbidity level of the combined filter effluent so as not to exceed 1.0 Nephelometric Turbidity Unit ("NTU") and not to exceed 0.3 NTU in at least 95% of the samples tested each month [30 Tex. Admin. Code § 290.111(b)(1)(A) and Tex. Health & Safety Code § 341.0315(c)].
- 3. Failed to monitor the disinfectant residual of the water in each disinfection zone at least once each day [30 Tex. ADMIN. CODE § 290.110(c)(1)(A)].
- 4. Failed to continuously monitor and record the turbidity level of the combined filter effluent at least once every four hours [30 Tex. ADMIN. CODE § 290.111(c)(2)(A)].

PENALTY CONSIDERATIONS

Total Assessed: \$16,321

Total Deferred: \$16,321

___ Expedited Order

Financial Inability to Pay

X SEP Conditional Offset

Total Due to General Revenue: \$0

The administrative penalty shall be conditionally offset by the completion of a Supplemental Environmental Project (SEP).

Site Compliance History Classification N/A

Person Compliance History Classification N/A

Major Source: Yes X No

Applicable Penalty Policy: September 2002

Findings Order Justification:

Eleven prior NOVs with the same violation as current enforcement action.

CORRECTIVE ACTIONS TAKEN/REQUIRED

Corrective Actions Taken:

The Executive Director recognizes that the City implemented the following corrective measures at the Facility:

- 1. As of June 2004, began submitting SWMORs for the surface water treatment facility.
- As of March 2007, began maintaining the turbidity level of combined filter effluent below 1.0 NTU and 0.3 NTU in at least 95% of the tested samples.
- 3. As of May 2006, began monitoring the disinfectant residual of the water in each disinfection zone at least once per day.
- 4. As of May 2006, began monitoring and recording the turbidity level of the combined filter effluent at least once every four hours.
- 5. As of May 2006, began monitoring and recording the filtered water turbidity level at the effluent of each individual filter at least once every fifteen minutes.
- 6. Properly disposed of all plant wastes in accordance with all applicable regulations and state statutes including both liquid and solid waste or by-product material from operation and/or maintenance.
- Properly calibrated the on-line pH meter, turbidimeter, and disinfectant residual analyzers within the required time frames.
- Placed an air respirator in an accessible location outside of the chlorination room.
 The air respirator meets OSHA standards for construction and operation.

Ordering Provisions:

The Respondent shall undertake the following technical requirements:

 Within 30 days, begin maintaining the general appearance of all the water system's facilities.

RESPONDENT NAME: CITY OF EDGEWOOD

DOCKET NO.: 2007-1089-PWS-E

VIOLATION SUMMARY CHART:		
VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
5. Failed to continuously monitor and record the filtered water turbidity level at the effluent of each individual filter at least once every fifteen minutes [30 Tex. ADMIN. CODE § 290.111(c)(4)(A)].		Within 45 days, submit written certification compliance with Ordering Provision No 1. Within 90 days, promptly elimina unacceptable plumbing practices as they a
6. Failed to maintain the potable storage tanks so that they are thoroughly tight against leakage [30 Tex. Admin. Code §§ 290.46(m)(1)(A) and 290.43(c)(6), Tex. Health & Safety Code § 341.036, and TCEQ Agreed Order Docket No. 2004-1540-PWS-E, Ordering Provision No. 3.a.ii].		 discovered, to prevent possible contamination of the water supplied by the regulated entit 4. Within 105 days, submit written certification of compliance with Ordering Provision No. 5. Within 120 days, begin maintaining the potable storage tanks so that they a thoroughly tight against leakage.
7. Failed to provide for disposition of all plant wastes in accordance with all applicable regulations and state statutes including both liquid and solid waste and by-product material from operation and/or maintenance [30 Tex. Admin. Code § 290.42(a)(2)(B)].		 6. Within 135 days, submit written certification of compliance with these Ordering Provision 7. Implement and complete a Supplement Environmental Project (SEP) (See SE
8. Failed to promptly eliminate unacceptable plumbing practices as they are discovered, to prevent possible contamination of the water supplied by the regulated entity [30 Tex. ADMIN. CODE § 290.46(j)(2) and Tex. Health & Safety CODE § 341.036].		Attachment A — Cleanup of Unauthorize Trash Dumps – Van Zandt County).
9. Failed to maintain the general appearance of the system's facilities and equipment [30 Tex. ADMIN. CODE § 290.46(m)].		
10. Failed to perform mandatory calibrations of laboratory equipment used for treatment compliance monitoring [30 Tex. ADMIN. CODE § 290.46(s)(2)].		
11. Failed to provide a full face self-contained breathing apparatus or air respirator that meets OSHA standards for construction and operation which must be located outside the chlorination room in an accessible location [30 Tex. ADMIN. CODE § 290.42(e)(4)(A)].		
·		

Attachment A Docket Number: 2007-1089-PWS-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:

City of Edgewood

Penalty Amount:

Sixteen thousand three hundred twenty-one dollars (\$16,321)

SEP Offset Amount:

Sixteen thousand three hundred twenty-one dollars (\$16,321)

Type of SEP:

Pre-approved

Third-Party Recipient:

Texas Association of RC&D Areas, Inc. - Cleanup of

Unauthorized Trash Dumps

Location of SEP:

Van Zandt County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

The Respondent shall contribute the SEP Offset Amount to the Third-Party Recipient named above. The contribution will be to Texas Association of RC&D Areas, Inc. for the Cleanup of Unauthorized Trash Dumps Project in Van Zandt County as set forth in an agreement between the Third-Party Recipient and the TCEQ. SEP funds will be used to coordinate with city and/or county governments or local entities for the clean up of sites where trash and debris has been disposed of illegally. Eligible sites will be limited to those where a responsible party can not be identified, there is no preexisting obligation to clean up the site by the owner or the government, and reasonable efforts have already been taken to prevent the dumping. Any remaining SEP funds after completion of the Trash Dump Cleanup may, upon approval of the Executive Director, be spent on the Abandoned Tire Site Cleanup, Water or Wastewater Treatment Assistance, or other approved RC&D project. All dollars contributed will be used solely for the direct cost of the project and no portion will be spent on administrative costs. The SEP will be done in accordance with all federal, state and local environmental laws and regulations.

The Respondent certifies that it has no prior commitment to make this contribution and that it is being done solely in an effort to settle this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by helping to rid communities of the dangers and health threats associated with non-regulated trash dumps which contaminate air and water, and harbor disease carrying animals and insects.

C. Minimum Expenditure

City of Edgewood Agreed Order Docket No. 2007-1089-PWS-E Attachment A

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the Agreed Order with the contribution to:

Texas Association of Resource Conservation and Development Areas, Inc. (RC&D) 1716 Briarcrest Drive Suite 510 Bryan, Texas 77802-2700

3. Records and Reporting

Concurrent with the payment of the SEP Offset Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Litigation Division
Attention: SEP Coordinator, MC 175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If Respondent does not perform its obligations under this SEP in any way, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Offset Amount.

In the event of incomplete performance, the Respondent shall include on the check the docket number of this Agreed Order and a note that it is for reimbursement of a SEP. The Respondent shall make the payment for the amount due to "Texas Commission on Environmental Quality" and mail it to:

Litigation Division
Attention: SEP Coordinator, MC 175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear

City of Edgewood Agreed Order Docket No. 2007-1089-PWS-E Attachment A

statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

Policy Revision 2 (Sep.	Penalty Calculation	on Worksheet (F	PCW)	lune 26, 2007
TCEQ				
DATES Assigned PCW	28-Sep-2007 Screening 28-Sep-2007	EPA Due 31-May-2008		
RESPONDENT/FACILITY	INFORMATION			
	City of Edgewood			
Reg. Ent. Ref. No.		Mata //Miles - O	Minan	
Facility/Site Region	5-Tyler	Major/Minor Source	WIITOF	
CASE INFORMATION				
Enf./Case ID No.	34136	No. of Violations	11	
Docket No.	2007-1089-PWS-E	Order Type		
	Public Water Supply		Andrea Linson-Mgbeoduru	
Multi-Media	imit Minimum \$50 Maximum	\$1,000 EC's ream[EnforcementTeam 2	J
Admin. Penalty \$ I	Limit willimum \$50 waximum	\$1,000		
	Penalty Calcul	ation Section		
TOTAL BASE PENAL	TY (Sum of violation base penaltie		Subtotal 1	\$9,450
ADJUSTMENTS (+/-)	TO SUPTOTAL 1			
Subtotals 2-7 are obtain	ned by multiplying the Total Base Penalty (Subtotal 1) by	the indicated percentage.	b Berlinder in die beleich Enstität auslich wellicht die His	sedddiaeth e
Compliance Histo	ory 81%	Enhancement Subto	otals 2, 3, & 7	\$7,654
	Enhancement due to eleven Notices of Viola	ation ("NOVs") for the same		
Notes	or similar violations, three NOVs with diss		•	
	Agreed Order containing a de	nial of liability.		
Culpability	No 0%	Enhancement	Subtotal 4	\$0
Guipability	NO published a transfer our conference (4/4)	Linationicit	the second resident and the second se	4 0
Notes	The Respondent does not meet the	culpability criteria.		
		<u> Marina da la companya da Marina</u>	the second second	
Good Faith Effor	to Comply 0%	Reduction	Subtotal 5	\$0
	Before NOV NOV to EDPRP/Settlement Offer		•	
Extraordinary				
Ordinary N/A	X (mark with x)			
Notes	The respondent does not meet the	Good Faith criteria.		
	1976 - Art Line - Art State - Art		proprietation (A. 1.1.5.20). Long. At 1995, May 49	
	la tang 1944 yang dan kalalah <u>alah 1944 yang t</u> ang dan dan 1945 yang terbesa	Enhancement*	Subtotal 6	\$0
Approx.	Total EB Amounts \$3,413 *Capped Cost of Compliance \$11,750	at the Total EB \$ Amount		
, , , , , , , , , , , , , , , , , , ,	<u> </u>			
SUM OF SUBTOTAL	S 1-7	F	inal Subtotal	\$17,104
		describer se me properties es me propert	And regions of the control of the co	
OTHER FACTORS AS	S JUSTICE MAY REQUIRE	19%	Adjustment	\$3,200
Reduces or enhances the Final S	ubtotal by the indicated percentage. (Enter number only	1		
Notes	Enhancement recommended for recov	ery of avoided costs of		
Morea	compliance.	es la lagra la sec		
		Final Pen	nalty Amount	\$20,304
			·	
STATUTORY LIMIT A	DJUSTMENT	Final Asses	ssed Penalty	\$16,321
The second secon	The second secon	Programme and the second secon		
DEFERRAL		0% Reduction	Adjustment	- \$0
Reduces the Final Assessed Pen	alty by the indicted percentage. (Enter number only; e.g	. 20 for 20% reduction.)		
Notes	No deferral is recommended for	Findings Orders		
Notes	INO deterral is recommended for	i manga Oracia.		
***************************************	<u> </u>			
PAYABLE PENALTY				\$16,321

Docket No. 2007-1089-PWS-E

PCW

Policy Revision 2 (September 2002) PCW Revision June 26, 2007

Respondent City of Edgewood

Case ID No. 34136

Reg. Ent. Reference No. RN101404887

Component Number of...

Notes

Media [Statute] Public Water Supply

Enf. Coordinator Andrea Linson-Mgbeoduru

Compliance History Worksheet >> Compliance History Site Enhancement (Subtotal 2)

NOVs Orders Judgments and Consent Decrees Convictions	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria) Other written NOVs Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria) Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria) Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	11 3 1 0	55% 6% 20% 0%	
ludgments nd Consent Decrees	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria) Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria) Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0 0	20%	
ludgments nd Consent Decrees	meeting criteria) Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria) Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%	
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nd Consent Decrees	of this state or the federal government (number of judgements or consent decrees meeting criteria) Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%	
Decrees	judgments or consent decrees without a denial of liability, of this state or the federal government	0	1	
Convictions			0%	
	Any criminal convictions of this state or the federal government (number of counts)	0	0.%	
Emissions	Chronic excessive emissions events (number of events)	0	0%	
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%	
, ladita	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%	
	Pleas	se Enter Yes or No		
a syr	Environmental management systems in place for one year or more	No	0%	
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%	:
Odici	Participation in a voluntary pollution reduction program	No	0%	* *:
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%	
	Adjustment Pe	ercentage (S	ubtotal 2)	81%
/iolator (Su	btotal 3)			
N/A	Adjustment Pe	ercentage (S	ubtotal 3)	0%
nce History				
N/A	Adjustment Pe	ercentage (S	ubtotal 7) [0%
nce History	Summary	nutebook for a silipan		Waler St.
	AND THE CASE TO AND A STATE STATE OF THE STA	eru area es estillettes este	nertabe tite fielt 1	445.31.7175
1	N/A nce History N/A	Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted) Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed) Pleas Environmental management systems in place for one year or more Voluntary on-site compliance assessments conducted by the executive director under a special assistance program Participation in a voluntary pollution reduction program Early compliance with, or offer of a product that meets future state or federal government environmental requirements Adjustment Policy (Subtotal 3) N/A Adjustment Policy Person Classification (Subtotal 7) N/A Adjustment Policy Person Summary Compliance Enhancement due to eleven Notices of Violation ("NOVs") for the same or similar violations.	Audits Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted) Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed) Other Environmental management systems in place for one year or more Voluntary on-site compliance assessments conducted by the executive director under a special assistance program Participation in a voluntary pollution reduction program Early compliance with, or offer of a product that meets future state or federal government environmental requirements Adjustment Percentage (Similar Violator (Subtotal 3)) N/A Adjustment Percentage (Similar Violation (Subtotal 7)) N/A Adjustment Percentage (Similar Violation Summary Enhancement due to eleven Notices of Violation ("NOVs") for the same or similar violations, three NOVs	Audits Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted) Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed) Please Enter Yes or No

Total Adjustment Percentage (Subtotals 2, 3, & 7)

Screening Date	28-Sep-2007 Docket No. 2007-1089-PWS-E	AND DESCRIPTION OF THE PROPERTY OF THE PROPERT	PCW
Respondent	City of Edgewood	Policy Re	vision 2 (September 2002)
Case ID No.		PC	W Revision June 26, 2007
Reg. Ent. Reference No.			
	Public Water Supply		,
l .	Andrea Linson-Mgbeoduru		
Violation Number		1	
Rule Cite(s)	30 Tex. Admin. Code §§ 290.110(e)(2) and 290.111(e)(2)		
Violation Description	Failed to submit Surface Water Monthly Operating Reports ("SWMORs") by the day of the month following the end of the reporting period. Specifically, the Cit submit SWMORs for its surface water treatment facility from January throug 2004.	y did not	·
	Base	Penalty[\$1,000
>> Environmental, Property a	nd Human Health Matrix		
	Harm		
Release	Major Moderate Minor		
OR Actual Potential	Percent 0%		·
Potertial	Tercent 0/0		
>>Programmatic Matrix			6
Falsification	Major Moderate Minor		
	x Percent 10%		
			:
Matrix Notes	100% of the rule requirement was not met.		
	Adjustment .	\$900	
			\$100
Violation Events			
Number of Vic	lation Events 5 151 Number of violation days	3 *	
774	daily monthly x		
mark only one	quarterly Violation Base	Penalty	\$500
with an x	semiannual		
•	annual single event		
	Five monthly events are recommended.		
<u> </u>	XXXXX		
Economic Benefit (EB) for th	s violation Statutory Limit Tes	t i i i i i i i i i i i i i i i i i i i	
propriet (Brown is a right. Les Editholms des printes and the second of the algorithms and the second of the secon		Ity Total	\$1,074
Estimated	I EB Amount \$10 Violation Final Pena	ity i Otai	
	This violation Final Assessed Penalty (adjusted fo	or limits)	\$1,074

	E	conomic	Benefit W	orks	sheet	entre de la companya	
Responden	t City of Edgewood	od					
Case ID No							
Reg. Ent. Reference No							
	a Public Water Su	unaly					Years of
Violation No		yphia				Percent Interest	Depreciation
Violation No	1. 1		nings on eachigh		property of the second	lan et etan int l	
				1 100		5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	n No commas or \$				HAR THE CONTRACT OF STREET		
Delayed Costs	s						
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	#### in/a	\$0
Record Keeping System				0.0	\$0	n/acsets.	\$0
Training/Sampling				0.0	\$0	strain/aminuti	\$0
Remediation/Disposal				0.0	- \$0	title - En/article 1411	\$0
Permit Costs				0.0	\$0	it in/althan	\$0
Other (as needed)	\$500 Estimated cos	11-Jan-2004 st to submit SWM0	10-Jun-2004 ORs. Date required	0.4 d is the 1	\$10 first month of nonc	ompliance. Final da	\$10
Notes for DELAYED costs	Estimated cos	et to submit SWM0	ORs. Date required date	d is the toomp	first month of noncollance.	ompliance. Final da	ite is expected
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Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated cos	et to submit SWM0	ORs. Date required date	d is the forcement of composition of	first month of noncollance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ompliance. Final da	ste is expected \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated cos	et to submit SWM0	ORs. Date required date	d is the forcement of composition of	first month of noncollance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ompliance. Final da	ste is expected \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated cos	et to submit SWM0	ORs. Date required date	d is the forcement of composition of	first month of noncollance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ompliance. Final da	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated cos	et to submit SWM0	ORs. Date required date	d is the forcement of composition of	first month of noncollance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ompliance. Final da	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated cos	et to submit SWM0	ORs. Date required date	d is the forcement of composition of	first month of noncollance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ompliance. Final da	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated cos	et to submit SWM0	ORs. Date required date	d is the forcement of composition of	first month of noncollance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ompliance. Final da	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date	28-Sep-2007		Docket No	o. 2007-1089-PWS-E		PCW
Respondent	City of Edgewood		•		Policy Re	evision 2 (September 2002)
Case ID No.					' PC	W Revision June 26, 2007
Reg. Ent. Reference No.						
Media [Statute]						
Enf. Coordinator		gbeoduru				
Violation Number	2					
Rule Cite(s)	30 Tex. Admin. 0	Code § 290.111(b)(1)(A) and Tex. H	ealth & Safety Code § 3	41.0315(c)	•
Violation Description	1.0 Nephelometr the samples tes	ric Turbidity Unit ("Nated each month.	NTU") and not to Specifically, the C	d filter effluent so as not exceed 0.3 NTU in at le ity exceeded the turbidit he months of October 20	ast 95% of y level for	
				Ва	se Penalty[\$1,000
>> Environmental, Property a		alth Matrix Harm				
OR Release Actual Potential		oderate Mino	r	Percent 25%		
>>Programmatic Matrix						
Falsification	Major Mo	oderate Mino	r	29.72		
				Percent 0%		
Matrix Notes Failure to mai		els exposes custom exceed levels prot		amounts of contaminan health.	ts which do	
				Adjustment	\$750	harana ana
					Γ	\$250
Violation Events					_	· · · · · · · · · · · · · · · · · · ·
Number of Vio	lation Events	2	57	Number of violation da	ays	
,			<u> </u>	= 1		***************************************
	daily monthly	x				
mark only one	quarterly			Violation Ba	se Penalty	\$500
with an x	semiannual					
·	annual					
	single event	<u> </u>				
Ţ 					*1	
	-	Two monthly events	s are recommend	ded.		,
Economic Benefit (EB) for thi	s violation		e de la companya de l	Statutory Limit Te	est	
Estimated	EB Amount	\$2	,050	Violation Final Pe	naity Totai	\$1,074
•		This viola	ation Final Asse	ssed Penalty (adjusted	for limits)	\$1,074

		conomic l	penent w	OFKS	sneet	aturie randr	
Respondent	, ,	od					
Case ID No.							
Reg. Ent. Reference No.	RN101404887						
Media Violation No.	Public Water St 2	Jpbly				Percent Interest	Years of Depreciation
			낚일하는 그리지			5.0	18
하는 사람이 살아 다른데 살려야.	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
하는 시작에 가진 그런 되었다. 개		Date Negulieu	I illai Dale	113	milerest Saveu	Olletime Costs	LD Amount
Item Description	No commas or \$	er al artist	Trible of Labor				talan da kata da ka
en la companya de la					reger at the second of the second	and the second of the second o	
Delayed Costs	<u> </u>				the second second		<u> </u>
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
· Land				0.0	\$0	tik ##in/arti/4	\$0
Record Keeping System				0.0	\$0	n/a ir (w	\$0
Training/Sampling				0.0	\$0	i n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a ité.	\$0
Other (as needed)			21 1	0.0	\$0	n/ai/	\$0
Notes for DELAYED costs	AMA	11A1 17E 141 avoid		-tariwa	10-70-0-46-	one-time avoided c	AAN issilaanse ta
Avoided Costs	ANN	UALIZE [1] avoide	au costs perore e	0.0	S0	\$0	\$0
Disposal				0.0	\$0	\$0	\$0 \$0
Personnel	<u> </u>			0.0	\$0	\$0	\$0 \$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0 \$0
Supplies/equipment				0.0	\$0	\$0 \$0	\$0 \$0
Financial Assurance [2]	\$1,000	1-Oct-2004	31-Oct-2004	1.0	\$50	\$1,000	\$1,050
ONE-TIME avoided costs [3]	\$1,000	1-Feb-2007	28-Feb-2007	0.0	\$0	\$1,000	\$1,000
Other (as needed)	\$1,000	1-r-eb-2001	20-1 60-2001	<u> 0.0 </u>	<u> </u>	<u> </u>	ψ1,000
Notes for AVOIDED costs			date required is th	e month		ance that could have tion occurred. The f	
Notes for Avoided costs	ing the Marian			A	<u>i i na minana a</u>	and the second	<u> </u>

Screening Date	28-Sep-2007	Docket No. 2007-1089-PWS-E	PCW
Respondent		pod Polik	by Revision 2 (September 2002)
Case ID No.	34136		PCW Revision June 26, 2007
Reg. Ent. Reference No.	RN101404887		
Media [Statute]	Public Water S	Supply	}
Enf. Coordinator	Andrea Linson	-Mgbeoduru	
Violation Number	3		
Rule Cite(s)		30 Tex. Admin. Code § 290.110(c)(1)(A)	
Violation Description	11	itor the disinfectant residual of the water in each disinfection zone at lea /. Specifically, the City failed to monitor the disinfectant residual on Apri and April 2, 2006.	33
		Base Pena	ity \$1,000
>> Environmental, Property a	and Human I	lealth Matrix	***************************************
	alandina isa	Harm	
Release		Moderate Minor	
OR Actual Potential	 _ _ _ _ _ _ _ 	Percent 25%	
Foteritia	X	1 elcent 2070	
>>Programmatic Matrix			
	Major	Moderate Minor	
		Percent 0%	
			_
		nfectant residual on a daily basis could result in customers of the water	!
Notes Supply be	aling exposed si	gnificant amounts of contaminants which would exceed levels that are protective of human health.	
		Adjustment \$7	50
The state of the s			¢050
			\$250
Violation Events			
		THE PARTY OF THE PROPERTY OF THE STANDARD OF THE PARTY OF	their activity
Number of Vio	olation Events	2 Number of violation days	
	ne se visus, ete die. F		
	daily = monthly		
mark only one	quarterly	Violation Base Pena	Ity \$500
with an x	semiannual		
	annual		
	single event	X	
<u> </u>			-
Two single e	vents are recor	nmended, calculated based on one event for each day monitoring did n	ot
		occur.	
Economic Benefit (EB) for th	is violation.	Statutory Limit Test	
Estimata	d EB Amount	\$200 Violation Final Penalty To	tal \$1,074
Launate	a SD Alliount	Totalion I mail charty 10	ψ1,01 ⁻¹
		This violation Final Assessed Penalty (adjusted for limi	ts) \$1,074
			and the second of the second o

	Е	conomic	Benefit W	ork	sheet		
Respondent	City of Edgewood	od					
Case ID No.							
Reg. Ent. Reference No			•				
	Public Water Su	unnly.					Years of
	1	appry				Percent Interest	Depreciation
Violation No.	, 3	and the second of the second	والمراوي والمتابع المحاوم والمراوي		عمره ويوسونون	Maria da Maria da Maria	Depreciation
						5.0	15
그렇게 그렇게 살길이 있는 그 중에는	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs		A Company of the Comp	e de la companya de La companya de la co			en e	
Equipment				0.0	\$0	\$ O	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	Haller n/aller	\$0
Record Keeping System				0.0	\$0	ili ili kn/ai ili ili	\$0
Training/Sampling				0.0	\$0	INTERNATION	\$0
Remediation/Disposal				0.0	\$0	in in/ai.	\$0
Permit Costs				0.0	. \$0	it is in n/at I in the	\$0
Other (as needed)		L	L	0.0	\$0	Trailine n/aki/saus	\$0
Notes for DELAYED costs						1	
Avoided Costs	ANN	UALIZE [1] avoid	ed costs before e	ntering	item (except for	one-time avoided c	osts)
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment		1 . 144 9 .	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	0.0	\$0	\$0	\$0
Financial Assurance [2]	10.000	2 648	e e stilly en list in the fi	0.0	\$0	\$0	\$0
QNE-TIME avoided costs [3]	\$200	1-Apr-2006	30-Apr-2006	0.0	\$0	\$200	\$200
Other (as needed)			1 1 1	0.0	\$0	\$0	\$0
Notes for AVOIDED costs			The date required		rst date of the viola	calculated for the mo tion. The final date	
Approx. Cost of Compliance		\$200			TOTAL		\$200

Screening Date	28-Sep-2007	D	ocket No. 2007-1089	P-PWS-E	PCW
	City of Edgewood	· t		Policy Re	evision 2 (September 2002)
Case ID No.				PC	CW Revision June 26, 2007
Reg. Ent. Reference No.	RN101404887				
Media [Statute]	·				
Enf. Coordinator		lgbeoduru			
Violation Number				·	
Rule Cite(s)		30 Tex. Admin. Co	de § 290.111(c)(2)(A)		
Violation Description	effluent at lea	tinuously monitor and reco ast once every four hours. bined filter effluent for 13 April	Specifically, the City fa	iled to continuously	
				Base Penalty[\$1,000
>> Environmental, Property a	and Human He	alth Matrix			
Release		Harm Ioderate Minor		and the first of the second conditions to the second second to the second second to the second secon	
OR Actual					
Potential	X		Percent	25%	
>>Programmatic Matrix Falsification	Major M	loderate Minor			
Talsincation	IVIAJOI IV	loderate iwinor	Percent	0%	
	<u> </u>				**
	stomers of the wat	and record the monitoring er supply being exposed t xceed levels that are prote	o significant amounts o	f contaminants which	
			Adjustment	\$750	•
	udit (), said has Continue (established difficulty biblished) diffi	entropy (State Company of the Compan	out with the transfer of the state of the st		
		,		L	\$250
Violation Events					
Number of Vic	plation Events	13	3 Number of	violation days	
Number of vic	Nation Eventa			· ·	
mark only one with an x	daily monthly quarterly semiannual annual single event	X	V	iolation Base Penalty[\$3,250
Thirteen sir	igle events are red	commended, calculated be when monitoring did		each four hour period	
Economic Benefit (EB) for th	is violation		Statutor	y Limit Test	
Estimated	d EB Amount	\$42	Violatio	on Final Penalty Total	\$6,983
		This violation F	inal Assessed Penalt	y (adjusted for limits)	\$3,000
				NUMBER OF THE PERSON	但不是有效。2012年12月1日

A STATE OF THE PARTY OF THE PAR	E	conomic	Benefit W	orks	sheet		
Respondent	City of Edgewoo	od					
Case ID No.	, ,		•				
Reg. Ent. Reference No.							
		unnhe					Years of
	Public Water S	ирріу				Percent Interest	Depreciation
Violation No.	4		y jako er er egen	and the second	manager server series		Depreciation
는 제설한 15kg - 10 - 10 This year						5.0	15
요한테 아무리와 눈이 들었다.	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
itelii Description	MO COMILIES OF T				1 1 1 1 1 1 1 1 1 1		
egyny ner i fyrir 18. julius a 61.14.	100		engling and an array of	de tije kiti	and the second		migration and dis
Delayed Costs		1	1	0.0	\$0	\$0	\$0 I
Equipment Buildings				0.0	\$0	\$0	\$0 \$0
- 1			ļ	0.0	\$0	\$0	\$0
Other (as needed) Engineering/construction			 	0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System			i ———	0.0	\$0	ina n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	it la n/ass	\$0
Permit Costs				0.0	\$0	Maximum/all Till	\$0
Other (as needed)				0.0	\$0	J17/4- in/a Alv III	\$0
Notes for DELAYED costs							
Avoided Costs	ANN	UALIZE [1] avoid	ed costs before e	ntering	item (except for	one-time avoided c	osts)
Disposal				0.0	\$0	\$0 T	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling	\$500	1-Apr-2006	30-Apr-2006	0.1	\$2	\$40	\$42
Supplies/equipment		994		0.0	\$0	\$0	\$0
Financial Assurance [2]		100		0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]	3.00.00		Self-real forms	0.0	\$0	\$0	\$0
Other (as needed)		.:		0.0	\$0	\$0	\$0
Notes for AVOIDED costs						er effluent at the fou g were not performe	

Screening Date	28-Sep-2007	Docket No. 2007-1089-PWS-E	PCW
	City of Edgewood	•	Policy Revision 2 (September 2002)
Case ID No.			PCW Revision June 26, 2007
Reg. Ent. Reference No.	RN101404887		
	Public Water Supply		Name and Associated States
Enf. Coordinator	Andrea Linson-Mgbe	oduru	
Violation Number	5		
Rule Cite(s)		30 Tex. Admin. Code § 290.111(c)(4)(A)	
Violation Description	of each individual filte	ly monitor and record the filtered water turbidity level at the ear at least once every fifteen minutes. Specifically, the City initor the individual filter effluent from April 1 to April 2, 2006.	effluent failed to
		Base	Penalty \$1,000
>> Environmental, Property a	nd Human Health	n Matrix	
	Har	rm	
Release	Major Mode	erate Minor	
OR Actual Potential	x	Percent 25%	
Colonial			
>>Programmatic Matrix			
Falsification	Major Mode		
		Percent 0%	
Matrix Notes Failure to congresult in cus	tomers of the water s	record the monitoring results of the combined filtered effluer upply being exposed to significant amounts of contaminants ad levels that are protective of human health.	nt could which
		Adjustment	\$750
		Esta (Esta III) esta (1911 Meleca, 1914 esta 1917 Melecanica Manuella de Austria Melecanica Melecanica (1917 Me	
			\$250
Violation Events			
Number of Vio	olation Events 2	2 Number of violation days	
mark only one with an x	daily monthly quarterly semiannual single event x	Violation Base	Penalty \$500
	122		
Two single e	events are recommend	ded, calculated based on one event for each day the moniton not occur.	ing did
Economic Benefit (EB) for th	is violation	Statutory Limit Test	
Fetimate	d EB Amount	\$42 Violation Final Penal	ty Total \$1,074
		This violation Final Assessed Penalty (adjusted fo	r limits) \$1,074

	City of Edgewoo	od					
Case ID No.	. 34136						
Reg. Ent. Reference No.							
	Public Water St	unnly					Years of
Violation No.		29913				Percent Interest	Depreciation
Violation No.	. 3	The state of the papers.	swip many gran		and a second second	1	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	1 No commas or \$						
ನಿಗಳು ಎಂದು ಕಾರ್ಯವಾಗಿಕೊಂಡಿದ್ದಾರೆ. 		- No.					
Delayed Costs				* * *	1.5	Name and the second	
Equipment				0.0	\$0	so I	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0,0	\$0	n/aicuti	\$0
Training/Sampling				0.0	\$0	n/a	\$O
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	in/a tir	\$0
Other (as needed)				0.0	\$0	anada n/a	\$O
Notes for DELAYED costs							
Avoided Costs	ANN	UALIZE [1] avoid	ed costs before e			one-time avoided c	
California, il delle ser dine est estima est estima est				0.0	\$0	\$0	\$0
Disposal			30-Apr-2006	0.0	\$0	\$0 \$40	\$0
Personnel	0500					540	\$42
Personnel Inspection/Reporting/Sampling	\$500	1-Apr-2006	30-ADI-2000	0.1	\$2		
Personnel Inspection/Reporting/Sampling Supplies/equipment	\$500	1-Api-2006	30-Apr-2000	0.0	\$0	\$0	\$0 *C
Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	\$500	1-Apr-2006	30-дрг-2000	0.0	\$0 \$0	\$0 \$0	\$0
Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	\$500	1-Api-2006	30-Api-2000	0.0 0.0 0.0	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	\$500	1-Api-2006	30-ADI-2000	0.0	\$0 \$0	\$0 \$0	\$0
Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	The avoide	d costs include the	amount to contino	0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 anitor the individua	\$0 \$0 \$0	\$0 \$0 \$0 15 minutes,

S	creening Date	28-Sep-2007	Docket	No. 2007-1089-PWS-E		PCW
	Respondent	City of Edgewood			Policy Revis	ion 2 (September 2002)
	Case ID No.	34136			PCW	Revision June 26, 2007
Reg. Ent. I	Reference No.	RN101404887				. [
_		Public Water Supply				
Ent	f. Coordinator	Andrea Linson-Mgbeoduru	I			
y	/iolation Number	6				
	Rule Cite(s)	30 Tex. Admin. Code §§ 2 341.036; and TCEQ Agre	90.46(m)(1)(A) and 290 eed Order Docket No. 2 No. 3.a.ii.	D.43(c)(6); Tex. Health & Safety (2004-1540-PWS-E, Ordering Pro	Code § vision	
Viola	ation Description	leakage. Specifically, duri ground storage tank was impossible to walk around	ng the investigation, it water ponders the tank. Additionally, a	that they are thoroughly tight ag was observed that the 0.4 million ding at its base to a point where equipment could not be used to a the ground was saturated from	gallon it was remove	
				.Base F	enalty.	\$1,000
SS Environmen	ital Property a	ınd Human Health Ma	itrix			
		Harm		THE STATE OF THE S		
	Release	Major Moderate	Minor			
OR	Actual			Percent 10%		
	Potential	x	<u> </u>	Percent 10%		
>>Programmat	Deligibility Company of the property of the property of the company of the compan	Major Moderate	Minor			
	Falsification	Major Moderate	NINO!	Percent 0%		**
	<u> </u>					
	11	aintain all water storage fac	ilities in a watertight coi	ndition could result in the exposu is that are protective of human h	re or a :	
Note Note	s significant a	annount of contaminants wi	icii do flot exoced level	o that are protective or name.		
	The second secon				0000	
				Adjustment	\$900	İ
						\$100
Violation Even	ts					
			1			4
	Number of Vio	olation Events 7	61	1 Number of violation days		
		daily	7			
		monthly	1			
	mark only one	quarterly. x	1	Violation Base F	² enalty	\$700
	with an x	semiannual				
		annual				
		single event				
	IT					
	Seven quari Docket N	terly events are recommen- lo. 2004-1540-PWS-E, Jan	ded, calculated from the uary 26, 2006, to the so	e effective date of TCEQ Agreed creening date, September 28, 20	Order 07.	
Economic Ben	nefit (EB) for th	is violation		Statutory Limit Test		
	Estimato	d EB Amount	\$199	Violation Final Penalt	v Total	\$1,504
***************************************	Estimate	a LD Alliount				
			This violation Final A	Assessed Penalty (adjusted for	limits)	\$1,504

	E	conomic	Benefit W	orks	sheet		
Respondent	City of Edgewoo	od					
Case ID No.							
Reg. Ent. Reference No.							
	Public Water Su	innly					Years of
Violation No.		,664				Percent Interest	Depreciation
Violation No.		e cape against	and the second		and the second		
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs	1, 1, 2, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,					1 X. 4	
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)	\$1,000	26-Jan-2006	30-Nov-2008	2.8	\$9	\$190	\$199
Engineering/construction				0.0	\$0	\$0	\$0
Land				0,0	\$0	talita n/a	\$0
Record Keeping System				0.0	\$0	ts if the n/a	\$0
Training/Sampling				0.0	\$0	itstettin/alsamiei	\$0
Remediation/Disposal	ļ			0.0	\$0	Site in/al site	\$0
Permit Costs				0.0	\$0	i i n/a i	\$0
Other (as needed)				0.0	\$0	n/a	\$0
Notes for DELAYED costs Avoided Costs	TCEQ Ag	reed Order Dock	et No. 2004-1540-P	WS-E.	Final date is the	ate required is the et estimated date of cor one-time avoided c	npliance.
Disposal	7,111,	Ditalia [1] avoid	1	0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]		17.0		0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Notes for AVOIDED costs			en de la Santa de Santa de la Santa de La composição de la Composição de la Santa de la S				
. 1							
The second second second second second			<u> </u>				

Screening Date	28-Sep-2007	Docket No. 2007-	1089-PWS-E	PCW
Respondent	City of Edgewood		Policy R	evision 2 (September 2002)
Case ID No.	34136		P	CW Revision June 26, 2007
Reg. Ent. Reference No.	RN101404887			·
Media [Statute]	Public Water Supply		•	
Enf. Coordinator	Andrea Linson-Mgbeoduru	ı		
Violation Number	7			,
Rule Cite(s)	3'	Tex. Admin. Code § 290.42(a)(2)	(B)	
Violation Description	Failed to provide proper d regulations and state statu from operation and/or ma	lisposition of all plant wastes in acc les including both liquid and solid wa aintenance. Specifically, during the y's sludge lagoons were full and ne	ordance with all applicable vaste or by-product material investigation, it was noted ar overflowing.	
			Base Penalty	\$1,000
Notes	Major Moderate Major Moderate X Major Moderate th or the environment could	Minor Perce Minor Perce be exposed to significant amounts of human health, as a result of the	of pollutants, which do not e violation.	\$100
Violation Events			HTM: HTT SETS FILL	
***************************************	2	56 Numb	er of violation days	
mark only one with an x	daily		Violation Base Penalty	\$200
		ed, one quarterly event for each lag 2007, to the screening date, Septe		
Economic Benefit (EB) for th	is violation	Stati	utory Limit Test	
Estimate	d EB Amount	\$279 Vid	olation Final Penalty Total	\$430
		This violation Final Assessed Pe	enalty (adjusted for limits)	\$430

	E	conomic	Benefit W	orks	sheet		
Respondent	City of Edgewood	nd					
Case ID No.		J u					
Reg. Ent. Reference No.	1						Years of
	Public Water Su	nbbia				Percent Interest	Depreciation
Violation No.	, 7		4				
						5.0	. 15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description		Arab		The state			y data li
Delayed Costs			100		. 3.34 (12.3		
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction	\$3,000	3-Aug-2007	30-Nov-2008	1.3	\$13	\$266	\$279
, Land				0.0	\$0	Pital in/although	\$0
Record Keeping System				0.0	\$0	itii i n/ai	\$0
Training/Sampling				0.0	\$0	HI44 stn/at	\$0
Remediation/Disposal				0.0	\$0	iritiesin/ass. isti	\$0
Permit Costs				0.0	\$0	i i i i i i n/a: i i	\$0
Other (as needed)				0.0	\$0	(distribution/astronomic	\$0
Notes for DELAYED costs		investigat	ion date. Final date	e is the	estimated date of		
Avoided Costs	ANN	UALIZE [1] avoid	ed costs before el			one-time avoided c	\$0
Disposal				0.0	\$0 \$0	\$0 \$0	\$0
Personnel				0.0	\$0	\$0	\$0 \$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	<u>, ψυ</u>	Ι ΨΟ Ι	
Notes for AVOIDED costs				: 41 40 19 : 9 4			
Approx. Cost of Compliance		\$3,000]		TOTAL		\$279

Screening Date	28-Sep-2007	Docket No.	2007-1089-PWS-E	PCW
Respondent	City of Edgewood	· ·	. Policy I	Revision 2 (September 2002)
Case ID No.			F	PCW Revision June 26, 2007
Reg. Ent. Reference No.	RN101404887			
Media [Statute]	Public Water Supply		•	
Enf. Coordinator	Andrea Linson-Mgbeodu	ıru .		
Violation Number	8			=1
Rule Cite(s)	30 Tex. Admin. Cod	e § 290.46(j)(2) and Tex. Health	n and Safety Code § 341.036	-
Violation Description	prevent possible of Specifically, during the inpections conducted requiring installation of Shuman, Dorothy Gra	contamination of the water suppl nvestigation, the investigator do d in July 2005 indentified the fo	ocumented that customer service illowing sites as high hazards issemblies: J's Grocery, Mamie the city's wastewater treatment	
			Base Penalty	\$1,000
>> Environmental, Property a	ind Human Health N			
	Harm		Physical and a second s	
Release	Major Moderate	e Minor		
OR Actual				
Potential	X		Percent 25%	
>>Programmatic Matrix Falsification	Major Moderate	e Minor		
Faisincation	Major Moderate		Percent 0%	
			078	
	istalled, could allow a sign	acceptable plumbing practices, nificant amount of contaminants evels that are protective of hum	s to enter ther water supply which	
			6-T-	.
		A. C. L.	djustment \$750	<u>'</u>
	·			\$250
Violation Events				
	10	56	Number of violation days	
			Number of violation days	
	daily			
	monthly x	<u> </u>		
mark only one	quarterly		Violation Base Penalty	\$2,500
with an x	semiannual			
	annual			
	single event			
l l			Harris Carlo	7
		ed, based on two monthly event gust 3, 2007, to the screening d	s for each site listed, calculated ate, September 28, 2007.	
Economic Benefit (EB) for th	is violation		Statutory Limit Test	
Estimated	EB Amount	\$486	Violation Final Penalty Total	\$5,371
	V		-	A= 0= :
		This violation Final Assess	ed Penalty (adjusted for limits)	\$5,371

	E	conomic	Benefit W	orks	heet		
Respondent	City of Edgewoo	od .				,	
Case ID No.		-					
Reg. Ent. Reference No.							
	Public Water Su	ipply				Percent Interest	Years of
Violation No.	.8					reicem interest	Depreciation
· · · · · · · · · · · · · · · · · · ·			, igita el teretario	5.7		5.0	15
수분회 환경화 그들 것 같아 생각하		B. (- B)	Final Date		Interest Saved	Onetime Costs	EB Amount
	Item Cost	Date Required	rinai Date	Yrs	interest Saveu	Onetime Costs	ED AMOUNT
Item Description	No commas or \$						
and the second s					e we i gowenie,		was in the second
Delayed Costs	5 7 7 5			,		<u>ag 1 Maria di Nasa di A</u>	
Equipment	\$2,250	31-Jul-2005	31-Aug-2008	3.1	\$23	\$463	\$486
Buildings				0.0	\$0	\$0	\$0
Other (as needed)			<u> </u>	0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land			<u> </u>	0.0	\$0	Title In/a III III	\$0
Record Keeping System			<u> </u>	0.0	\$0	m/a literal	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal			<u> </u>	0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	in/a i i i i i i	\$0
Other (as needed)				0.0	\$0	n/a	\$0
Notes for DELAYED costs Avoided Costs		investigatio	on date. The final d	ate is the	e estimated date of	one-time avoided c	osts)
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]	10 10			0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]	7.7.5			_ 0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
- Notes for AVOIDED costs							
Approx. Cost of Compliance		\$2,250			TOTAL		\$486

Screening Date	28-Sep-2007		Docket No.	2007-1089-PWS-E	PCW
Respondent	City of Edgewo	boo			Policy Revision 2 (September 2002)
Case ID No.					PCW Revision June 26, 2007
Reg. Ent. Reference No.	RN101404887	•			
Media [Statute]	Public Water S	Supply			
Enf. Coordinator	Andrea Linson	-Mgbeoduru			
Violation Number					
Rule Cite(s)		30 Tex. Ad	min. Code § 290).46(m)	
Violation Description	system's facili	ties and equipment. Spe and weeds that were ap	ecifically, during	n the general appearance the investigation, it was no feet high were surrounding age tank.	ted that
				Base	Penalty \$1,000
>> Environmental, Property a	and Human h	Health Matrix Harm			
Release OR . Actual Potential		Moderate Minor		Percent 5%	
>>Programmatic Matrix					
Falsification	Major	Moderate Minor			
				Percent 0%	
Matrix Notes If the syste insignificar	m's facilities are nt amounts of co	e not maintained, custon ontaminants which would heal	d not exceed lev	system could be exposed els that are protective of h	to an uman
			1	Adjustment	\$950
A Time of the Anthony	cier kalikulikirin er austrusidakili Pilipada Mind kalikulikirin e	and patholic and industrial Americans and the Wielesch Alback and even be Little (Charles)	galaineadh ann am ann ann ann ann ann ann ann ann	god = 0 da a Servicio del medicio del medi	\$50
Violation Events					
Number of Vic	olation Events	12	56	Number of violation days	
mark only one with an x	daily monthly quarterly semiannual annual single event	X		Violation Base	Penalty \$50
· · · · · · · · · · · · · · · · · · ·	ration in the second	One single event is	s recommended.	10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
Economic Benefit (EB) for th	is violation			Statutory Limit Test	
and for Control of the Section of the Control of the Section of th	d EB Amount	S	17	Violation Final Penal	
	pagaya mayore, sprince as assessment or their sections	This violat	ion Final Asses	sed Penalty (adjusted for	

			Benefit W				a fill (Ville)
	t City of Edgewood	00					
Case ID No							
Reg. Ent. Reference No						The state of the s	
Media	a Public Water Si	upply				Percent Interest	Years of
Violation No	. 9						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
		Dute Required	Tinai Bato				
Item Description	No commas or \$						
and the second s		1 1 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	4				ومواور والمناب
Delayed Costs	\$	<u> </u>		1		- 00 T	- 00
Equipment				0.0	\$0	\$0	\$0
Buildings	2000	0.007	04.140000	0.0	\$0 \$1	\$0 \$17	\$0 \$17
- Other (as needed)	\$300	3-Aug-2007	31-May-2008	0.8	\$0	\$0	\$0
Engineering/construction				0.0	\$0 \$0	φυ I Na in/a	\$0 \$0
Land				0.0	\$0	i limi n/a	\$0 \$0
Record Keeping System			<u></u>	0.0	\$0 \$0	n/a	\$0 \$0
Training/Sampling				0.0	\$0	in/a ili	\$0 \$0
Remediation/Disposal Permit Costs				0.0	\$0	n/a	\$0
Permit Costs		ll l			: 40	STANDARD CONTROL OF THE CANADAL SEASON OF STREET	
Other (as needed)	The delayed of	cost includes the a	mount to provide la	0.0	\$0 tenance for the a	area surrounding the	\$0 sludge lagoon
Notes for DELAYED costs	and the groun	nd storage tank. Th	ne date required is	awn main the inves complianc	tenance for the a tigation date. The e.	rea surrounding the e final date is the est	\$0 sludge lagoon imated date of
Notes for DELAYED costs Avoided Costs	and the groun	nd storage tank. Th	ne date required is	awn main the inves compliance	tenance for the a tigation date. The ee. tem (except for	area surrounding the e final date is the est one-time avoided c	\$0 sludge lagoon imated date of osts)
Notes for DELAYED costs Avoided Costs Disposal	and the groun	nd storage tank. Th	ne date required is	awn main the inves compliance intering i	tenance for the a tigation date. The ee. tem (except for \$0	one-time avoided c	\$0 sludge lagoon imated date of osts) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	and the groun	nd storage tank. Th	ne date required is	awn main the inves compliance intering in 0.0	tenance for the a tigation date. The e. tem (except for \$0 \$0	one-time avoided c	\$0 sludge lagoon imated date of osts) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	and the groun	nd storage tank. Th	ne date required is	awn main the investompliand intering in 0.0 0.0	tenance for the a tigation date. The te. tem (except for \$0 \$0 \$0	one-time avoided c	\$0 sludge lagoon imated date of osts) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	and the groun	nd storage tank. Th	ne date required is	awn main the investompliand intering in 0.0 0.0 0.0	tenance for the a tigation date. The se. tem (except for \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 sludge lagoon imated date of osts) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	and the groun	nd storage tank. Th	ne date required is	awn main the investompliand intering in 0.0 0.0 0.0 0.0	tenance for the a tigation date. The se. tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 sludge lagoon imated date of osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	and the groun	nd storage tank. Th	ne date required is	awn main the investompliand intering in 0.0 0.0 0.0 0.0 0.0	tenance for the a tigation date. The se. tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided company solutions of the est one-time avoided company solutions solutions of the est of the e	\$0 sludge lagoon imated date of sts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	and the groun	nd storage tank. Th	ne date required is	awn main the investompliand intering in 0.0 0.0 0.0 0.0	tenance for the a tigation date. The se. tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 sludge lagoon imated date of osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	and the groun	nd storage tank. Th	ne date required is	awn main the investompliand intering in 0.0 0.0 0.0 0.0 0.0	tenance for the a tigation date. The se. tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided company solutions of the est one-time avoided company solutions solutions of the est of the e	\$0 sludge lagoon imated date of sts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	and the groun	nd storage tank. Th	ne date required is	awn main the investompliand intering in 0.0 0.0 0.0 0.0 0.0	tenance for the a tigation date. The se. tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided company solutions of the est one-time avoided company solutions solutions of the est of the e	\$0 sludge lagoon imated date of sts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	and the groun	nd storage tank. Th	ne date required is	awn main the investompliand intering in 0.0 0.0 0.0 0.0 0.0	tenance for the a tigation date. The se. tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided company solutions of the est one-time avoided company solutions solutions of the est of the e	\$0 sludge lagoon imated date of sts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	and the groun	nd storage tank. Th	ne date required is	awn main the investompliand intering in 0.0 0.0 0.0 0.0 0.0	tenance for the a tigation date. The se. tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided company solutions of the est one-time avoided company solutions solutions of the est of the e	\$0 sludge lagoon imated date of sts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	and the groun	nd storage tank. Th	ne date required is	awn main the investompliand intering in 0.0 0.0 0.0 0.0 0.0	tenance for the a tigation date. The se. tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided company solutions on the street of the st	\$0 sludge lagoon imated date of sts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date	28-Sep-2007	Docket No. 2007-	1089-PWS-E	PGW
	City of Edgewood		Policy Re	evision 2 (September 2002)
Case ID No.			PO	CW Revision June 26, 2007
Reg. Ent. Reference No.	RN101404887		•	
	Public Water Supply			
Enf. Coordinator	Andrea Linson-Mgbeoduru			
Violation Number				
Rule Cite(s)	3	0 Tex. Admin. Code § 290.46(s)(2)	
Violation Description	compliance monitoring. Spe	tory calibrations of laboratory equip ecifically, during the investigation, in nd disinfectant residual analyzers within the required time frames.	it was noted that the on-line were not being calibrated	
			Base Penalty	\$1,000
>> Environmental, Property a	and Human Health Wat Harm	INX CONTRACTOR OF THE PROPERTY		
OR Release Actual Potential	Major Moderate	Minor Perce	ent 25%	
>>Programmatic Matrix				
Falsification	Major Moderate	Minor		
		Perce	ent 0%	
Matrix Notes Failure to per of water ar	nd potentially expose the pul	y equipment could result in improp olic to significant amounts of pollut are protective of human health.	er disinfection or treatment ants which would exceed	, , , , , , , , , , , , , , , , , , ,
		Adjustr	ment \$750	'
e Allanda de Aria de A	ing paganan dan kecamatan dari seria kan beranggan dan kecamatan dan dan dan dan dan dan dan dan dan d		•	\$250
Violation Events				
Number of Vi	olation Events 2	56 Numb	per of violation days	
mark only one with an x	daily monthly x quarierly semiannual annual single event		Violation Base Penalty	\$500 ·
Two monthly	y events are recommended, date of so	calculated from the investigation d creening, September 28, 2007.	date, August 3, 2007, to the	
Economic Benefit (EB) for th	nis violation	Stat	utory Limit Test	
3. page 1. July 2. and control the page 16 page 2 and the control and the cont	ed EB Amount	in making, its 201 mass Andrews Andrews Association and the Andrews E. Other and Community and Andrews Produces	olation Final Penalty Total	\$1,074
		This violation Final Assessed Po	enalty (adjusted for limits)	\$1,074
			CONTRACTOR	

Kesponuent				OI K.	sheet		
	City of Edgewood	,					
Case ID No.							
Reg. Ent. Reference No.	. RN101404887					<u></u>	
Media	Public Water Su	ıpply				Percent Interest	Years of
Violation No.	. 10					r crocint interest	Depreciation
			在4、Markey (1995)。		Control of the State	5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
no pilonini		Dato Hoquilla					
Item Description	No commas or \$		· file said si.				
						and the same	
Delayed Costs	<u> </u>	4	<u> </u>		<u> </u>	et de la telle	
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)	\$300	3-Aug-2007	31-May-2008	0.8	\$1	\$17	\$17
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	NAMED NAMED IN	\$0
Record Keeping System				0.0	\$0	r v≃⊷ n/a ⊮r	\$0
Training/Sampling		-		0.0	\$0	= : n/a ######	\$0
Remediation/Disposal				0.0	\$0	n/a∰ilik	\$0
Permit Costs				0.0	\$0	n/a 👭 👭	\$0
Other (as needed)				0.0	\$0	was n/a was his	\$0
	This is an estim	ated cost to prope	erly calibrate the lal	boraton	v equipment within	the required time fra	
Notes for DELAYED costs	r	equired is the inve	estigation date. The	final d	ate is the estimate	the required time fra	ames. The date
Avoided Costs	r	equired is the inve	estigation date. The	final d	ate is the estimate	d date of compliance	ames. The date
Avoided Costs	r	equired is the inve	estigation date. The	final d	ate is the estimate	d date of compliance one-time avoided c	ames. The date osts)
Avoided Costs Disposal Personnel	r	equired is the inve	estigation date. The	ntering	ate is the estimate item (except for \$0 \$0	one-time avoided c	osts)
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	r	equired is the inve	estigation date. The	ntering 0.0 0.0 0.0	ate is the estimate item (except for \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	r	equired is the inve	estigation date. The	ntering 0.0 0.0 0.0 0.0	ate is the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0	ames. The date e sosts) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	r	equired is the inve	estigation date. The	ntering	ate is the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d date of compliance one-time avoided c \$0 \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	r	equired is the inve	estigation date. The	ntering 0.0 0.0 0.0 0.0 0.0	ate is the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d date of compliance one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	ames. The date 3. sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	r	equired is the inve	estigation date. The	ntering	ate is the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d date of compliance one-time avoided c \$0 \$0 \$0 \$0 \$0	ames. The date a
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	r	equired is the inve	estigation date. The	ntering 0.0 0.0 0.0 0.0 0.0	ate is the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d date of compliance one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	ames. The date 3. sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	r	equired is the inve	estigation date. The	ntering 0.0 0.0 0.0 0.0 0.0	ate is the estimate item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	d date of compliance one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	ames. The date 3. sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$

Screening Date	28-Sep-2007	Docket No. 2007-1089-PWS-E	PCW
Respondent	City of Edgewood	F	Policy Revision 2 (September 2002)
Case ID No.			PCW Revision June 26, 2007
Reg. Ent. Reference No.	RN101404887		
	Public Water Supply		
i .	Andrea Linson-Mgbeoduru		
Violation Number			
Rule Cite(s)	30 Te	ex. Admin. Code § 290.42(e)(4)(A)	
Violation Description	meets OSHA standards for the chlorination room in an a was noted that the water s	self-contained breathing apparatus or air respirator the construction and operation which must be located out accesible location. Specifically, during the investigation system uses chlorine gas as a disinfectant and was not it a self-contained breathing apparatus.	side n, it
		Base Pe	nalty \$1,000
>> Environmental, Property a	and Human Health Matrix		
	Harm		,
Release		Minor	
OR Actual Potential	X	Percent 25%	
>>Programmatic Matrix			
Falsification	Major Moderate	Minor Percent 0%	
		Percent 0%	
Failure to	nave a full-face self-contained t	preathing apparatus or supplied air respirator that med	ets
Matrix OSHA sta		rgency could allow unprotected exposures to significa	nt
	amounts of chlorine gas th	at would be detrimental to human health.	
		Adjustment	<u>\$750</u>
		(Alternative of the Adjustment)	\$100
·			\$250
Violation Events			
Number of Vio	plation Events 1	56 Number of violation days	
	daily		
	monthly		
mark only one	quarterly	Violation Base Pe	nalty \$250
with an x	semiannual		
	annual single event x		
,	Single event X		
		dag terbila da la como de	
	One single	e event is recommended.	
			<u>: :</u>
Economic Benefit (EB) for th	is violation	Statutory Limit Test	
Estimate	EB Amount	\$70 Violation Final Penalty	Total \$537
Estillato			
	Thi	s violation Final Assessed Penalty (adjusted for li	mits) \$537

	E	conomic l	Benefit W	orks	sheet		
Respondent	t City of Edgewoo	od					
Case ID No	34136						
Reg. Ent. Reference No							
		upply					Years of
Media Public Water Supply					Percent Interest	Depreciation	
Violation No.	.11		and the second of			l and the share of	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs	e de la companya de l	enski (* 1856)					0.0004001
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction	\$1,200	3-Aug-2007	31-May-2008	0.8	\$3	\$66	\$70
Land				0.0	\$0	n/a + trill+	\$0
Record Keeping System				0.0	\$0	i washin/a	\$0
Training/Sampling				0.0	\$0	######################################	\$0
Remediation/Disposal				0.0	\$0	that in/all	\$0
Permit Costs				0.0	\$0	i ∰ bir∺in/ai i i ii i	\$0
Other (as needed)				0.0	\$0	irii irii n/a irii irii	\$0
Notes for DELAYED costs				nına anr			neets OSHA - II
			is the investigation	date. T	The final date is the	e estimated date of o	
Avoided Costs			is the investigation	n date. T	he final date is the	e estimated date of o	compliance.
Avoided Costs			is the investigation	n date. T	item (except for	e estimated date of one-time avoided c	osts)
Avoided Costs Disposal Personnel			is the investigation	ntering 0.0	item (except for \$0 \$0	e estimated date of o	osts)
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling			is the investigation	ntering 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0	e estimated date of cone-time avoided cone-time so \$0 \$0 \$0	osts) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment			is the investigation	ntering 0.0	item (except for \$0 \$0	one-time avoided c	osts) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]			is the investigation	ntering 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0	one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0	sompliance. \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			is the investigation	0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e estimated date of cone-time avoided cone-time avoided cone-time so	osts) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]			is the investigation	0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e estimated date of cone-time avoided cone-time so	sompliance. \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			is the investigation	0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e estimated date of cone-time avoided cone-time avoided cone-time so	sompliance. \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			is the investigation	0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e estimated date of cone-time avoided cone-time avoided cone-time so	sompliance. \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)			is the investigation	0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	e estimated date of cone-time avoided cone-time avoided cone-time so	sompliance. \$0

Compliance History

CN600738512 City Of Edgewood Classification: Rating: Customer/Respondent/Owner-Operator: Site Rating: Regulated Entity: RN101404887 CITY OF EDGEWOOD Classification: ID Number(s): PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 2340002 LICENSE 2340002 WATER LICENSING PO BOX 377, EDGEWOOD, TX, 75117 Location: **REGION 05 - TYLER** TCEQ Region: Date Compliance History Prepared: September 17, 2007 Enforcement Agency Decision Requiring Compliance History: September 17, 2002 to September 17, 2007 Compliance Period: TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Site Compliance History Components

512-239-1482

1. Has the site been in existence and/or operation for the full five year compliance period?

Yes

2. Has there been a (known) change in ownership of the site during the compliance period?

No

3. If Yes, who is the current owner?

Name:

N/A

4. if Yes, who was/were the prior owner(s)?

N/A

5. When did the change(s) in ownership occur?

N/A

Components (Multimedia) for the Site:

Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

Effective Date: 01/26/2006

Andrea Linson-Mgbeoduru

ADMINORDER 2004-1540-PWS-E

Classification: Minor

Citation:

30 TAC Chapter 290, SubChapter D 290.42(e)(3)(D)

Description: Failure to provide a method for determining the amount of disinfectant remaining for use.

Classification: Major

Classifica

30 TAC Chapter 290, SubChapter D 290.46(e)[G]

Description: Failure by the regulated entity to employ trained and licensed personnel.

Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter F 290.121(a)

Description: Failure to provide a copy of the up-to-date chemical and microbiological monitoring plan at the

facility.

Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter D 290.43(c)(6)

Description: Failure to maintain the potable water storage tank so that they are thoroughly tight against leakage.

Classification: Minor

Citation:

30 TAC Chapter 290, SubChapter D 290.42(h)

Description: Failure to provide sanitary facilities for operating personnel during water works installation...

Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter D 290.42(a)(1)

5A THC Chapter 341, SubChapter A 341,0315(c)

Description: Failure to provide production capacities that meet or exceed the maximum daily demand.

Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter D 290.45(b)(2)(B)

4G THC Chapter 321, SubChapter D 341.0315(c)

Description: Failure to meet the Minimum Water System Capacity Requirements.

Classification: Moderate

Citation:

30 TAC Chapter 290, SubChapter D 290.46(m)

Description: Failure to maintain the elevated storage tank exterior coatings.

Classification: Moderate

Citation:

i: Moderate 30 TAC Chapter 290, SubChapter D 290.42(d)(6)

30 TAC Chapter 290, SubChapter D 290.42(f)(1)(E)(ii)[G]

30 TAC Chapter 290, SubChapter D 290.42(f)(1)[G]

Description: Failure to provide adequate containment facilities for all liquid chemical storage tanks.

```
В.
          Any criminal convictions of the state of Texas and the federal government.
          N/A
          Chronic excessive emissions events.
C.
          The approval dates of investigations. (CCEDS Inv. Track. No.)
D.
                  06/13/2003
                                  (60901)
                   08/15/2003
                                  (395356)
                3 01/13/2004
                                  (396489)
                  02/27/2004
                                  (396490)
                5
                  08/31/2004
                                  (278618)
                6
                  06/17/2005
                                  (395428)
                7
                   07/07/2005
                                  (398292)
                8
                   08/16/2005
                                  (399623)
                9
                   07/31/2006
                                  (487130)
               10
                  09/18/2006
                                  (481582)
                   10/06/2006
                                  (514424)
               11
               12
                  01/12/2007
                                  (536626)
               13
                  06/27/2007
                                  (563520)
                  06/27/2007
                                  (563608)
               14
               15
                  06/27/2007
                                  (565971)
               16
                  06/27/2007
                                  (563514)
               17
                  06/27/2007
                                  (563665)
                  06/27/2007
                                  (563598)
               18
                  06/27/2007
                                  (563612)
               19
              20
                  06/27/2007
                                  (563604)
                  09/12/2007
                                  (572838)
          Written notices of violations (NOV). (CCEDS Inv. Track. No.)
E.
                Date: 08/15/2003
                                      (395356)
                Self Report?
                                                                                     Classification:
                                                                                                     Moderate
                                  30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
                Citation:
                                  5A THC Chapter 341, SubChapter A 341.033(d)
                                  FAILURE TO COLLECT ANY ROUTINE MONITORING SAMPLES IN 06/2003.
                Description:
                                                                                     Classification:
                Self Report?
                               NO
                                                                                                     Moderate
                Citation:
                                  30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
                                  FAILURE TO POST A PN FOR NOT COLLECTING ANY ROUTINE MONITORING
                Description:
                                  SAMPLES IN 06/2003.
                Date: 01/13/2004
                                      (396489)
                Self Report?
                                                                                     Classification:
                                                                                                     Moderate
                                  30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
                Citation:
                                  5A THC Chapter 341, SubChapter A 341.033(d)
                                  FAILURE TO COLLECT ANY ROUTINE MONITORING SAMPLES IN 11/2003.
                Description:
                                                                                     Classification:
                Self Report?
                                  30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
                Citation:
                                  FAILURE TO POST A PN FOR NOT COLLECTING ANY ROUTINE MONITORING
                Description:
                                  SAMPLES IN 11/2003.
                Date: 02/27/2004
                                      (396490)
                                                                                     Classification:
                Self Report?
                                                                                                     Moderate
                Citation:
                                  30 TAC Chapter 290, SubChapter F 290.109(c)(2)(A)(ii)
                                  5A THC Chapter 341, SubChapter A 341.033(d)
                                  FAILURE TO COLLECT ANY ROUTINE MONITORING SAMPLES IN 01/2004.
                Description:
                                                                                     Classification:
                                                                                                     Moderate
                Self Report?
                                  30 TAC Chapter 290, SubChapter F 290.122(c)(2)(A)
                Citation:
                                  FAILURE TO POST A PN FOR NOT COLLECTING ANY ROUTINE MONITORING
                Description:
                                  SAMPLES IN 01/2004.
                Date: 08/02/2004
                                      (563514)
                                                                                     Classification:
                                                                                                     Moderate
                Self Report?
                                  30 TAC Chapter 290, SubChapter F 290.110(e)(2)
                Citation:
                                  30 TAC Chapter 290, SubChapter F 290.111(e)(2)
                Description:
                                  Failed to report SWMOR for February 2004.
                Date: 08/02/2004
                                      (563598)
                                                                                     Classification:
                                                                                                     Moderate
                Self Report?
                Citation:
                                  30 TAC Chapter 290, SubChapter F 290.110(e)(2)
                                  30 TAC Chapter 290, SubChapter F 290.111(e)(2)
                Description:
                                  Failure to report SWMOR for April 2004.
```

Date: 08/02/2004

(563520)

NO Classification: Self Report? Moderate

Citation: 30 TAC Chapter 290. SubChapter F 290.110(e)(2) 30 TAC Chapter 290, SubChapter F 290.111(e)(2)

Failed to report SWMOR for March 2004. Description:

Date: 08/04/2004 (536626)

Classification: Self Report? Moderate

30 TAC Chapter 290, SubChapter F 290.110(e)(2) Citation:

30 TAC Chapter 290, SubChapter F 290.111(e)(2) Failure to submit surface water monthly operating report for January 2004.

Description: Date: 09/10/2004 (563604)

Self Report? Classification: Moderate

30 TAC Chapter 290, SubChapter F 290.110(e)(2) Citation:

30 TAC Chapter 290, SubChapter F 290.111(e)(2) Failed to report SWMOR for May 2004.

Description: Date: 12/09/2004 (563608)

Self Report? Classification:

30 TAC Chapter 290, SubChapter F 290,111(b)(1)(A)(i) Citation:

Moderate

1 day with combined filter effluent turbidity readings above 1.0 NTU in October 2004. Description:

Date: 08/31/2005

Citation:

Citation:

Citation:

Classification: Moderate Self Report?

30 TAC Chapter 290, SubChapter D 290.43(c)(6) Citation:

Failure to maintain the potable water storage tank so that they are thoroughly tight Description: against leakage.

NO

Classification: Major Self Report?

30 TAC Chapter 290, SubChapter D 290.45(b)(2)(B) Citation:

Failure to meet this Agency's "Minimum Water System Capacity Requirements." These Description: requirements include: a treatment plant capacity of 0.6 gallons per minute per

connection under normal rated design flow.

Classification: Moderate Self Report? NO

Citation: 30 TAC Chapter 290, SubChapter D 290.42(a)(1)

5A THC Chapter 341, SubChapter A 341.0315(c) Description: Failure to provide production capacities that meet or exceed the maximum daily

demand.

Classification: Moderate Self Report? NO 30 TAC Chapter 290, SubChapter D 290.45(b)(2)(B)

4G THC Chapter 321, SubChapter D 341.0315(c)

Failure to meet the Minimum Water System Capacity Requirements. Description:

Self Report? Classification: Moderate

30 TAC Chapter 290, SubChapter D 290.46(m) Failure to maintain the elevated storage tank exterior coatings. Description:

Self Report? Classification: Moderate

30 TAC Chapter 290, SubChapter D 290.42(d)(11)(E)(i) Citation: Failure to equip the filters with sampling taps so that the effluent turbidity of each filter

Description: can be individually monitored.

Classification: Self Report?

30 TAC Chapter 290, SubChapter D 290.42(d)(5) Citation:

Failure to provide flow measuring devices to measure the raw water supplied to the Description: plant, the recycled water, the treated water used to backwash the filters, and the treated

water leaving the plant.

Classification: Self Report? NO

30 TAC Chapter 290, SubChapter D 290.46(m)(1)[G] Citation: Failure to inspect potable water storage tanks. The elevated storage tank and the

Description: 0.400 MG ground storage tank should be inspected and minor repairs should continue to be made, if necessary to protect water quality, even with the impending replacement and

refurbishment projects currently scheduled.

Self Report? Classification: Minor 30 TAC Chapter 290, SubChapter D 290.46(s)(2)[G]

Failure to perform mandatory calibrations of laboratory equipment used for treatment Description:

compliance monitoring.

Classification: Minor Self Report? NC

30 TAC Chapter 290, SubChapter D 290.43(c)(4) Citation:

Failure to equip the 0.400 MG ground storage tank with a water level indicator Description:

located at the tank site. Date: 06/06/2006 (563612)

Classification: Moderate

Self Report? NO

30 TAC Chapter 290, SubChapter F 290.110(c)(1)(A) Citation:

2 days when disinfection data were not collected in April 2006. Description:

30 TAC Chapter 290, SubChapter F 290.110(c)(5)(C)

Self Report? Classification: Moderate

30 TAC Chapter 290, SubChapter F 290.111(c)(4)(A) Citation:

April 2006 - 2 days with individual filter effluent turbidity not properly monitored. Description: Classification: Self Report? Moderate

30 TAC Chapter 290, SubChapter F 290.111(c)(2)(A) Citation:

Description: April 2006 - 13 four hour periods when the plant was on-line and no combined filter

effluent turbidity reported.

Date: 07/27/2006 (487130)

Classification: Moderate Self Report?

30 TAC Chapter 290, SubChapter D 290.43(c)(6) Citation:

Failure to maintain the potable water storage tank so that they are thoroughly tight Description:

against leakage.

Classification: Moderate Self Report?

30 TAC Chapter 290, SubChapter D 290.46(m) Citation:

Failure to maintain the elevated storage tank exterior coatings. Description:

Self Report? Classification: Major

2A TWC Chapter 7, SubChapter A 7.101 Citation: ORDER Ordering Provisions 3.a.ii. and 3.a.iii. Rgmt Prov:

Description: Failure to comply with the Ordering Provisions of Commission Order 2005-1540-PWS-E.

Date: 09/19/2006

Citation:

Citation:

Self Report? Classification: Moderate

30 TAC Chapter 290, SubChapter D 290.42(d)(11)(E)(i) Description: Failure to equip the filters with sampling taps so that the effluent turbidity of each filter

can be individually monitored.

NO Classification: Minor Self Report?

30 TAC Chapter 290, SubChapter D 290.46(m)(1)[G] Citation:

Failure to inspect potable water storage tanks. The elevated storage tank and the Description:

0.400 MG ground storage tank should be inspected and minor repairs should continue to be made, if necessary to protect water quality, even with the impending replacement and

refurbishment projects currently scheduled.

Self Report? NO Classification: Minor

30 TAC Chapter 290, SubChapter D 290.46(s)(2)[G] Citation:

Failure to perform mandatory calibrations of laboratory equipment used for treatment Description:

compliance monitoring.

Classification: Minor Self Report? NO

30 TAC Chapter 290, SubChapter D 290.46(f)(3)(E)(iv) Citation:

FY06 CCI - Failure to have available during the investigation, copies of completed Description:

Customer Service Inspection (CSI) reports.

30 TAC Chapter 290, SubChapter D 290,46(m)(4)

Classification: Moderate Self Report?

Description: FY06 CCI - Failure to maintain all water treatment units in a watertight condition.

Classification: Self Report?

30 TAC Chapter 290, SubChapter D 290.42(d)(2)(C) Citation: FY06 CCI - Failure to provide an air gap or other acceptable (testable) backflow Description:

prevention device for make-up water supply lines to chemical feeder solution mixing

Classification: Moderate Self Report? NO

30 TAC Chapter 290, SubChapter D 290.42(d)(16) Citation:

FY06 CCI - Failure to provide a computer and software for the surface water treatment Description:

plant for recording performance data, maintaining records and submitting reports to the

executive director.

Self Report? NO Classification: Moderate

30 TAC Chapter 290, SubChapter D 290.46(e)(6)(A) Citation:

FY06 CCI - Failure to employ an operator who holds a Class "C" or higher surface water Description:

license as the water system does employ a part-time operator.

Classification: Minor Self Report? NO

30 TAC Chapter 290, SubChapter D 290.46(m) Citation:

FY06 CCI - Failure to maintain the Filter Head Control Tank which is located between Description:

the gravity filters and the transfer pumps.

Date: 04/06/2007 (563665)

Classification: Self Report? Moderate

30 TAC Chapter 290, SubChapter F 290.111(b)(1)(A)(i) Citation: 1 day with combined filter effluent turbidity above 1.0 NTU in February 2007. Description:

Self Report? Classification: Moderate

30 TAC Chapter 290, SubChapter F 290.111(b)(1)(A)(ii) Citation:

February 2007 - 10.4% of combined filter effluent turbidity readings were above 0.3 Description:

NTU. This exceeds the 5% limit.

F.

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Texas Commission on Environmental Quality



IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING CITY OF EDGEWOOD; RN101404887

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BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2007-1089-PWS-E

At its	agenda, the Texas Commission on Environmental Quality
("Commission" or "TCEQ")	considered this agreement of the parties, resolving an enforcement action
regarding City of Edgewood	("the City") under the authority of Tex. HEALTH & SAFETY CODE ch. 341 and
30 TEX. ADMIN. CODE ch. :	290. The Executive Director of the TCEQ, represented by the Litigation
Division, and the City, prese	ented this agreement to the Commission.
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The City understands that it has certain procedural rights at certain points in the enforcement process, including, but not limited to, the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Agreed Order, the City agrees to waive all notice and procedural rights.

It is further understood and agreed that this Agreed Order represents the complete and fully-integrated agreement of the parties. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Agreed Order are binding upon the City.

The Commission makes the following Findings of Fact and Conclusions of Law:

FINDINGS OF FACT

- 1. The City owns and operates a public water supply system located at a quarter mile north on County Road 3504 from the intersection of County Road 2507 and County Road 3504 near Edgewood in Van Zandt County, Texas (the "Facility") that has approximately 738 service connections and serves at least 25 people per day for at least 60 days per year; and provides water for human consumption.
- 2. During a record review conducted on March 11, 2007, a TCEQ investigator documented that the City:

- a. Failed to submit Surface Water Monthly Operating Reports ("SWMORs") by the tenth day of the month following the end of the reporting period. Specifically, the City did not submit SWMORs from January through May 2004.
- b. Failed to maintain the turbidity level of the combined filter effluent so as not to exceed 1.0 Nephelometric Turbidity Unit ("NTU") and not to exceed 0.3 NTU in at least 95% of the samples tested each month. Specifically, the City exceeded the turbidity level for the combined filter effluent at the Facility during the months of October 2004 and February 2007.
- c. Failed to monitor the disinfectant residual of the water in each disinfection zone at least once each day. Specifically, the City failed to monitor the disinfectant residual on April 1 and April 2, 2006.
- d. Failed to continuously monitor and record the turbidity level of the combined filter effluent at least once every four hours. Specifically, the City failed to continuously monitor the combined filter effluent for 13 consecutive four-hour intervals from April 1 to April 3, 2006.
- e. Failed to continuously monitor and record the filtered water turbidity level at the effluent of each individual filter at least once every fifteen minutes. Specifically, the City failed to properly monitor the individual filter effluent from April 1 to April 2, 2006.
- 3. The City received notice of the violations in paragraph 2 on or about June 28, 2007.
- 4. During an investigation conducted on August 3, 2007, a TCEQ investigator documented that the City:
 - a. Failed to maintain the potable storage tanks so that they are thoroughly tight against leakage. Specifically, during the investigation, it was observed that the 0.4 million gallon ground storage tank was leaking with water ponding at its base to a point where it was impossible to walk around the tank. Additionally, equipment could not be used to remove the grass and weeds due to the degree in which the ground was saturated from the leakage.
 - b. Failed to provide for disposition of all plant wastes in accordance with all applicable regulations and state statutes including both liquid and solid waste or by-product material from operation and/or maintenance. Specifically, during the investigation, it was noted that the Facility's sludge lagoons were full and near overflowing.
 - c. Failed to promptly eliminate unacceptable plumbing practices as they are discovered, to prevent possible contamination of the water supplied by the regulated entity. Specifically, during the investigation, the investigator documented that customer service

inpections conducted in July 2005 indentified the following sites as high hazards requiring installation of testable backflow prevention assemblies: J's Grocery, Mamie Shuman, Dorothy Graham, Dairy Queen, as well as the City's wastewater treatment plant. These sites currently do not have the required assemblies.

- d. Failed to maintain the general appearance of the system's facilities and equipment. Specifically, during the investigation, it was noted that high grass and weeds that were approximately two feet high were surrounding the lagoons and the ground storage tank.
- e. Failed to perform mandatory calibrations of laboratory equipment used for treatment compliance monitoring. Specifically, during the investigation, it was noted that the online pH meter, turbidimeter, and disinfectant residual analyzers were not being calibrated within the required time frames.
- f. Failed to provide a full face self-contained breathing apparatus or air respirator that meets OSHA standards for construction and operation which must be located outside the chlorination room in an accesible location. Specifically, during the investigation, it was noted that the water system uses chlorine gas as a disinfectant and was not equipped with a self-contained breathing apparatus.
- 5. The City received notice of the violations in paragraph 4 on or about September 12, 2007.
- 6. The Executive Director recognizes that the City has implemented the following corrective measures at the Facility:
 - a. As of June 2004, began submitting SWMORs for the surface water treatment facility:
 - b. As of March 2007, began maintaining the turbidity level of combined filter effluent below 1.0 NTU and 0.3 NTU in at least 95% of the tested samples;
 - c. As of May 2006, began monitoring the disinfectant residual of the water in each disinfection zone at least once per day;
 - d. As of May 2006, began monitoring and recording the turbidity level of the combined filter effluent at least once every four hours;
 - e. As of May 2006, began monitoring and recording the filtered water turbidity level at the effluent of each individual filter at least once every fifteen minutes;
 - f. Properly disposed of all plant wastes in accordance with all applicable regulations and state statutes including both liquid and solid waste or by-product material from operation and/or maintenance.

- g. Properly calibrated the on-line pH meter, turbidimeter, and disinfectant residual analyzers within the required time frames.
- h. Placed an air respirator in an accesible location outside of the chlorination room. The air respirator meets OSHA standards for construction and operation.

CONCLUSIONS OF LAW

- 1. As evidenced by Findings of Fact No. 1, the City is subject to the jurisdiction of the TCEQ pursuant to Tex. Health & Safety Code ch. 341 and the rules of the Commission.
- 2. As evidenced by Finding of Fact No. 2.a., the City failed to submit SWMORs by the tenth day of the month following the end of the reporting period, in violation of 30 Tex. ADMIN. CODE §\$ 290.110(e)(2) and 290.111(e)(2).
- As evidenced by Finding of Fact No. 2.b., the City failed to maintain the turbidity level of the combined filter effluent so as not to exceed 1.0 NTU and not to exceed 0.3 NTU in at least 95% of the samples tested each month, in violation of 30 Tex. ADMIN. CODE § 290.111(b)(1)(A) and Tex. Health & Safety Code § 341.0315(c).
- 4. As evidenced by Finding of Fact No. 2.c., the City failed to monitor the disinfectant residual of the water in each disinfection zone at least once each day, in violation of 30 Tex. ADMIN. CODE § 290.110(c)(1)(A).
- 5. As evidenced by Finding of Fact No. 2.d., the City failed to continuously monitor and record the turbidity level of the combined filter effluent at least once every four hours, in violation of 30 Tex. Admin. Code § 290.111(c)(2)(A).
- 6. As evidenced by Finding of Fact No. 2.e., the City failed to continuously monitor and record the filtered water turbidity level at the effluent of each individual filter at least once every fifteen minutes, in violation of 30 Tex. ADMIN. CODE § 290.111(c)(4)(A).
- 7. As evidenced by Finding of Fact No. 4.a., the City failed to maintain the potable storage tanks so that they are thoroughly tight against leakage, in violation of 30 Tex. ADMIN. CODE §§ 290.46(m)(1)(A) and 290.43(c)(6), Tex. Health & Safety Code § 341.036, and TCEQ Agreed Order Docket No. 2004-1540-PWS-E, Ordering Provision No. 3.a.ii.
- 8. As evidenced by Finding of Fact No. 4.b., the City failed to provide for disposition of all plant wastes in accordance with all applicable regulations and state statutes including both liquid and solid waste or by-product material from operation and/or maintenance, in violation of 30 Tex. ADMIN. CODE § 290.42(a)(2)(B).

- 9. As evidenced by Finding of Fact No. 4.c., the City failed to promptly eliminate unacceptable plumbing practices as they are discovered, to prevent possible contamination of the water supplied by the regulated entity, in violation of 30 Tex. ADMIN. CODE § 290.46(j)(2) and Tex. Health & Safety Code § 341.036.
- 10. As evidenced by Finding of Fact No. 4.d., the City failed to maintain the general appearance of the system's facilities and equipment, in violation of 30 Tex. Admin. Code § 290.46(m).
- 11. As evidenced by Finding of Fact No. 4.e., the City failed to perform mandatory calibrations of laboratory equipment used for treatment compliance monitoring, in violation of 30 Tex. ADMIN. CODE § 290.46(s)(2).
- 12. As evidenced by Finding of Fact No. 4.f., the City failed to provide a full face self-contained breathing apparatus or air respirator that meets OSHA standards for construction and operation which must be located outside the chlorination room in an accesible location, in violation of 30 Tex. ADMIN. Code § 290.42(e)(4)(A).
- Pursuant to Tex. Health & Safety Code § 341.049, the Commission has the authority to assess an administrative penalty against the City for violations of Tex. Health & Safety Code, TCEQ rules, and orders adopted under the Code.
- 14. An administrative penalty in the amount of sixteen thousand three hundred twenty-one dollars (\$16,321.00) is justified by the facts recited in this Agreed Order, and considered in light of the factors set forth in Tex. Health & Safety Code § 341.049(b). Sixteen thousand three hundred twenty-one dollars (\$16,321.00) shall be conditionally offset by the City's completion of a Supplemental Environmental Project ("SEP"). The City's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.

ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The City is assessed an administrative penalty in the amount of sixteen thousand three hundred twenty-one dollars (\$16,321.00) as set forth in Conclusions of Law No. 14 for violations of Tex. Health & Safety Code ch. 341 and the rules of the TCEQ. The payment of this administrative penalty and the City's compliance with all the terms and conditions set forth in this Agreed Order completely resolve the violations set forth by this Agreed Order in this action. However, the Commission shall not be constrained in any manner from requiring corrective actions or penalties for other violations that are not raised here. Sixteen thousand three hundred twenty-one dollars (\$16,321.00) shall be conditionally offset by the City's completion of a SEP.

- 2. The City shall implement and complete a SEP in accordance with Tex. WATER CODE § 7.067. As set forth in Conclusions of Law, Paragraph 14 above, sixteen thousand three hundred twenty-one dollars (\$16,321.00) of the assessed administrative penalty shall be offset with the condition that the City implements the SEP defined in Attachment A, incorporated herein by reference. The City's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.
- 3. Administrative penalty payments for any portion of the administrative penalty not offset by a SEP or for any portion of the SEP deemed by the Executive Director as not complete shall be made payable to "Texas Commission on Environmental Quality" and shall be sent with the notation "Re: City of Edgewood; Docket No. 2007-1089-PWS-E; Enforcement ID No. 34136" to:

Financial Administration Division, Revenues Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 4. The City shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order, the City shall begin maintaining the general appearance of all the water system's facilities, in accordance with 30 Tex. Admin. Code § 290.46. This includes, but is not limited to, removal of the weeds and grass surrounding the lagoons and ground storage tank.
 - b. Within 45 days after the effective date of this Agreed Order, the City shall submit written certification as described in Ordering Provision No. 4.g. below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 4.a.
 - c. Within 90 days after the effective date of this Agreed Order, the City shall promptly eliminate unacceptable plumbing practices as they are discovered, to prevent possible contamination of the water supplied by the regulated entity, in accordance with 30 Tex. Admin. Code § 290.46. Specifically, ensure backflow prevention assemblies are installed at sites identified as high health hazards. These sites include J's Grocery, Mamie Shuman, Dorothy Graham, Dairy Queen, and the City's wastewater treatment plant.
 - d. Within 105 days after the effective date of this Agreed Order, the City shall submit written certification as described in Ordering Provision No. 4.g. below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 4.c.

- e. Within 120 days after the effective date of this Agreed Order, the City shall begin maintaining the potable storage tanks so that they are thoroughly tight against leakage, in accordance with 30 Tex. Admin. Code § 290.43. This includes, but is not limited to, repairing the 0.4 million gallon ground storage tank so that is is not leaking and to prevent water from ponding at the base of the tank.
- f. Within 135 days after the effective date of this Agreed Order, the City shall submit written certification of compliance with Ordering Provision No. 4.e. as described in Ordering Provision No. 4.g.
- g. The certification required by Ordering Provisions Nos. 4.b., 4.d., and 4.f. shall include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance, be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Michael Brashear, Water Section Manager Tyler Regional Office Texas Commission on Environmental Quality 2916 Teague Drive Tyler, Texas 75701-3756

5. The provisions of this Agreed Order shall apply to and be binding upon the City. The City is ordered to give notice of this Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.

- 6. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the City shall be made in writing to the Executive Director. Extensions are not effective until the City receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
- 7. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to the City if the Executive Director determines that the City has not complied with one or more of the terms or conditions in this Agreed Order.
- 8. This Agreed Order shall terminate five years from its effective date or upon compliance with all terms and conditions set forth in this Agreed Order, whichever is later.
- 9. This Agreed Order, issued by the Commission, shall not be admissible against the City in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of the Tex. WATER CODE or the Tex. HEALTH & SAFETY CODE.
- This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
- The Chief Clerk shall provide a copy of this Agreed Order to each of the parties. Pursuant to 30 Tex. Admin. Code § 70.10(b) and Tex. Gov't Code § 2001.142, the effective date is the date of hand-delivery of the Order to the City, or three days after the date on which the Commission mails notice of the Order to the City, whichever is earlier.

City of Edgewood TCEQ Docket No. 2007-1089-PWS-E Page 9 of 9

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Charles Plulue

For the Executive Director

4/14/2009

Date

I, the undersigned, have read and understand the attached Agreed Order in the matter of City of Edgewood. I represent that I am authorized to agree to the attached Agreed Order on behalf of the City, and do agree to the specified terms and conditions. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I understand that by entering into this Agreed Order, the City waives certain procedural rights, including, but not limited to, the right to formal notice of violations addressed by this Agreed Order, notice of an evidentiary hearing, the right to an evidentiary hearing, and the right to appeal. I agree to the terms of the Agreed Order in lieu of an evidentiary hearing. This Agreed Order constitutes full and final adjudication by the Commission of the violations set forth in this Agreed Order.

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein.

I also understand that my failure to comply with the Ordering Provisions, if any, in this order and/or my failure to timely pay the penalty amount, may result in:

- A negative impact on the City's compliance history;
- Greater scrutiny of any permit applications submitted by the City;
- Referral of this case to the Attorney General's office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions against the City;
- Automatic referral to the Attorney General's Office of any future enforcement actions against the City: and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Signature

C.B. Prater JR.

Honorable Charles Prator, Mayor Authorized Representative of the

City of Edgewood

Date

Title

Attachment A Docket Number: 2007-1089-PWS-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:

City of Edgewood

Penalty Amount:

Sixteen thousand three hundred twenty-one dollars (\$16,321)

SEP Offset Amount:

Sixteen thousand three hundred twenty-one dollars (\$16,321)

Type of SEP:

Pre-approved

Third-Party Recipient:

Texas Association of RC&D Areas, Inc. – Cleanup of

Unauthorized Trash Dumps

Location of SEP:

Van Zandt County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

The Respondent shall contribute the SEP Offset Amount to the Third-Party Recipient named above. The contribution will be to **Texas Association of RC&D Areas, Inc.** for the *Cleanup of Unauthorized Trash Dumps Project* in Van Zandt County as set forth in an agreement between the Third-Party Recipient and the TCEQ. SEP funds will be used to coordinate with city and/or county governments or local entities for the clean up of sites where trash and debris has been disposed of illegally. Eligible sites will be limited to those where a responsible party can not be identified, there is no preexisting obligation to clean up the site by the owner or the government, and reasonable efforts have already been taken to prevent the dumping. Any remaining SEP funds after completion of the Trash Dump Cleanup may, upon approval of the Executive Director, be spent on the Abandoned Tire Site Cleanup, Water or Wastewater Treatment Assistance, or other approved RC&D project. All dollars contributed will be used solely for the direct cost of the project and no portion will be spent on administrative costs. The SEP will be done in accordance with all federal, state and local environmental laws and regulations.

The Respondent certifies that it has no prior commitment to make this contribution and that it is being done solely in an effort to settle this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by helping to rid communities of the dangers and health threats associated with non-regulated trash dumps which contaminate air and water, and harbor disease carrying animals and insects.

C. Minimum Expenditure

City of Edgewood Agreed Order Docket No. 2007-1089-PWS-E Attachment A

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the Agreed Order with the contribution to:

Texas Association of Resource Conservation and Development Areas, Inc. (RC&D) 1716 Briarcrest Drive Suite 510 Bryan, Texas 77802-2700

3. Records and Reporting

Concurrent with the payment of the SEP Offset Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Litigation Division
Attention: SEP Coordinator, MC 175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If Respondent does not perform its obligations under this SEP in any way, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Offset Amount.

In the event of incomplete performance, the Respondent shall include on the check the docket number of this Agreed Order and a note that it is for reimbursement of a SEP. The Respondent shall make the payment for the amount due to "Texas Commission on Environmental Quality" and mail it to:

Litigation Division
Attention: SEP Coordinator, MC 175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear

City of Edgewood Agreed Order Docket No. 2007-1089-PWS-E Attachment A

statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.